

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS	)	MDL NO. 2817
ANTITRUST LITIGATION	)	Case No. 1:18-CV-00864
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This document relates to:	)	
	)	Hon. Robert M. Dow, Jr.
ALL CASES	)	Magistrate Judge Jeffrey T. Gilbert

**MOTION OF NON-PARTY RESPONDENT DOMINION ENTERPRISES, INC. TO  
MODIFY CONFIDENTIALITY ORDER**

Non-party Respondent Dominion Enterprises, Inc. respectfully moves this Court to modify the Confidentiality Order entered in this matter. D.E. 104.

Pursuant to Local Rule 37.2, Dominion certifies that it has met and conferred with Reynolds and Reynolds Company's ("Reynolds") counsel in a good faith attempt to resolve the dispute presented by this motion. The first telephonic conference with Reynolds' counsel, after the transfer of the case to this court, took place on May 18, 2018. The participants were Leo D. Caseria for Reynolds and Marc Schildkraut for Dominion. The second telephonic conference took place on June 26, 2018 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. The third telephonic conference took place on July 19, 2018 between James L. McGinnis for Reynolds and Marc Schildkraut for Dominion. The final telephonic conference occurred on July 20 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. Counsel also conferred via email between May 22 and July 20, 2018, and confirmed

that the parties had reached an impasse. The email correspondence participants were Leo D. Caseria, Michael P.A. Cohen, and James L. McGinnis for Reynolds, and Marc Schildkraut for Dominion.

Dated: August 6, 2018

Respectfully submitted,

/s/ Marc Schildkraut

Marc Schildkraut  
Deepti Bansal  
Cooley LLP  
1299 Pennsylvania Ave, NW,  
Suite 700  
Washington, DC 20004  
(202) 728-7000  
(202) 728-7027  
mschildkraut@cooley.com  
dbansal@cooley.com

Jeff Norberg, Ill. Bar No. 6315012  
Neal & McDevitt, LLC  
1776 Ash Street  
Northfield, Il 60093  
(847) 441-9100  
jnorberg@nealmcdevitt.com

*Counsel for Non-Party Respondent  
Dominion Enterprises, Inc.*

**CERTIFICATE OF SERVICE**

I, Marc Schildkraut, an attorney, hereby certify that on August 6, 2018, I caused true and correct copies of the foregoing **Non-Party Dominion Enterprises, Inc. Motion to Modify Confidentiality Order** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

By: /s/ Marc Schildkraut

Marc Schildkraut  
Cooley LLP  
1299 Pennsylvania Ave, NW,  
Suite 700  
Washington, DC 20004  
(202) 728-7000  
mschildkraut@cooley.com

*Counsel for Non-Party Respondent  
Dominion Enterprises, Inc.*